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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) NO. CR 16-00227-SI-5
Plaintiff,)
v.)
BTC-E, A/K/A CANTON BUSINESS) STIPULATION TO EXCLUDE TIME;
CORPORATION,) ~~[PROPOSED]~~ ORDER
and)
ALEXANDER VINNIK,)
Defendants.)

The parties appeared before the Court for a status conference on September 8, 2023. At that time, a new trial date of September 30, 2024, was set at the request of the parties. In addition, it was

STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER
Case No. CR 16-00227-SJ-5

1 stipulated by and between counsel for the United States and counsel for the defendant, Alexander
2 Vinnik, that time be excluded under the Speedy Trial Act from September 8, 2023, through September
3 30, 2024. This time exclusion will allow defense counsel, who have newly appeared in this matter, to
4 prepare, including by reviewing the significant volume of discovery in this matter. For this reason, the
5 parties stipulate and agree that excluding time from September 8, 2023, through September 30, 2024,
6 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties
7 further stipulate and agree that the ends of justice served by excluding the time from September 8, 2023,
8 through September 30, 2024, from computation under the Speedy Trial Act outweigh the best interests
9 of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

10 Undersigned government counsel certify that they have obtained approval from counsel for the
11 defendant to file this stipulation and proposed order.

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13 IT IS SO STIPULATED.

ISMAIL J. RAMSEY
United States Attorney

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15 DATED: September 8, 2023

/s/
CLAUDIA QUIROZ
KATHERINE LLOYD-LOVETT
Assistant United States Attorneys
C. ALDEN PELKER
Trial Attorney, CCIPS Assistant United States
Attorney

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21 DATED: September 8, 2023

/s/ *Aleksandr Gruzman*
ALEKSANDR GRUZMAN
ARKADY BUKH Counsel for Defendant
ALEXANDER VINNIK

1 **[PROPOSED] ORDER**

2 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the
3 Court finds that failing to exclude the time from September 8, 2023, through September 30, 2024, would
4 unreasonably deny defense counsel and the defendant the reasonable time necessary for effective
5 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The
6 Court further finds that the ends of justice served by excluding the time from September 8, 2023,
7 through September 30, 2024, from computation under the Speedy Trial Act outweigh the best interests
8 of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS
9 HEREBY ORDERED that the time from September 8, 2023, to September 30, 2024, shall be excluded
10 from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

11 IT IS SO ORDERED.

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13 DATED: September 27, 2023

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HON. SUSAN ILLSTON
United States District Judge